

FILED

OCT - 4 2023  
U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHAD E. BROWN, a/k/a "JBo,"

Defendant.

No.

4:23CR521-MTS/RHH

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jeannette S. Graviss, Assistant United States Attorney for said District, and moves this Court to order the defendant detained pending further judicial proceedings, and further requests that a detention hearing be held three days from the date of the defendant's initial appearance before the United States Magistrate Judge pursuant to Title 18, United States Code, Section 3141, et. seq.

As for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142.

**Grounds for Detention**

1. Title 18, United States Code, Section 3142(f) provides that a hearing shall be held to determine whether any condition or combination of conditions will reasonably assure the appearance of such person as required and the safety of any other person and the community upon motion of the Government that there is a serious risk that such person will flee. *See* 18 U.S.C. § 3142(f)(2)(A).

2. There is a serious risk that the defendant will flee.

**The History and Characteristics of the Defendant**

3. Section 3142(g)(3)(A) requires this Court to consider the history and characteristics of the person, including the person's character, physical and mental condition, employment, financial resources, length of residence in the community, community ties, past conduct, history relating to drug or alcohol abuse, criminal history and record concerning appearance at court proceedings.

4. While the defendant has ties to the community, he also has ties to many other areas of the country. In fact, as described below, the defendant has criminal convictions in the Eastern District of Missouri and Georgia. Furthermore, the defendant has appeared in multiple videos posted on various social media platforms discussing his participation in a large-scale drug trafficking organization, the Black Mafia Family, a/k/a "BMF," describing himself at the "Junior Boss" of the organization.

5. The defendant discusses traveling to Mexico, and various locations throughout the United States to transport large quantities of drugs and cash.

6. Perhaps more troubling is the defendant's description of the organization, "We had rules, and, you know...we had orders, you know, you get caught, shut up, we gonna get you a lawyer, don't worry about that shit, we got you. You need to take some money and run?"

7. Additionally, the defendant described how he teaches people to do a better job at transporting money. For example, make sure that the smell of marijuana is not in the car before you stop to use the restroom.

8. The defendant described assaulting people who came into the "circle."

9. On February 1, 2006, the defendant was convicted of forgery and false identification documents in Georgia.

10. On April 3, 2009, the defendant was convicted of possession of a controlled substance.

11. On November 15, 2007, the defendant was convicted of conspiracy to distribute 5 kilograms or more of cocaine and conspiracy to commit money laundering in the Eastern District of Michigan and was sentenced to 188 months in prison.

12. On February 15, 2008, the defendant was convicted of being a felon in possession of a firearm in the Eastern District of Missouri. The defendant was found in possession of a firearm while he was subject to pretrial supervision for the case described in paragraph 11.

13. The defendant committed the instant offense while on supervised release.

#### **Risk of Flight**

14. There is a serious risk that the defendant will flee.

15. The defendant has the means to flee. The defendant's bank accounts show \$123,385 in cash deposits into bank accounts for which he was a signatory between June 15, 2018, and December 5, 2022.

16. The defendant has described his organization which will provide the funds to flee and has significant travel outside Missouri and has recently changed his address to Georgia.

#### **Conclusion**

17. There is clear and convincing evidence that no condition or combination of conditions will reasonably assure the safety of any other person and the community. Additionally, there is a preponderance of evidence that no condition or combination of conditions will reasonably assure the defendant's appearance in court.

Respectfully submitted,  
SAYLER A. FLEMING  
United States Attorney

/s/ Jeannette S. Graviss  
JEANNETTE S. GRAVISS, #44483(MO)  
Assistant United States Attorney